

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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DEBORAH S. SKEANS, Executrix of  
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,  
LLC, KEY COMMERCIAL  
FINANCE PROPERTIES, LLC,  
EQUITY PROS, LLC, and MOBILE  
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC

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JUSTIN BILLINGSLEY and KEY  
COMMERCIAL FINANCE, LLC,

Third-Party  
Plaintiffs,

v.

DEBORAH S. SKEANS and DARBIN  
SKEANS,

Third-Party  
Defendants.

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**PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure Plaintiff  
Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis moves for partial  
summary judgment against all named Defendants as to Counts I and V of the

Verified Complaint (D.I. 1).

The grounds for this motion are set forth in the accompanying Opening Brief in Support of Plaintiff's Motion for Partial Summary Judgment and Concise Statement of Material Facts in Support of Plaintiff's Motion for Partial Summary Judgment, filed contemporaneously with this motion.

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Estate of Frank E. Pavlis*

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